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October 4, 2022

VIA ECF

Honorable Susan D. Wigenton
United States District Judge
Martin Luther King, Jr. Federal Building
& United States Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *United States v. Daibes*
Criminal No. 18-655-SDW

Dear Judge Wigenton:

As Your Honor is aware, this Firm represents Defendant Fred Daibes in the above-captioned matter. Enclosed please find a consent order permitting Mr. Daibes to travel to London, England for necessary business purposes both tomorrow and at any time prior to sentencing, which is currently scheduled for December 12, 2022. As the Court may recall, approximately four (4) years ago, Mr. Daibes entered into a contract to develop a property at 115 River Road in Edgewater, New Jersey, partnering with a group from China. The property was a Super Fund site and was in the process of being cleaned up by a third party. Unfortunately, the cleanup process took longer than expected, and the Chinese group determined to pull out of the deal. Mr. Daibes has been engaged in discussions with a group of investors in London, which may be interested in replacing the Chinese group and partnering with Mr. Daibes. Mr. Daibes anticipates that these discussions will continue over the next two months, and this ability to travel during that time period will permit Mr. Daibes to continue to meet with them to negotiate their involvement without the need to burden the Court with repeated travel requests.

The Court has previously approved Consent Orders for travel abroad, including travel to London related to this same business transaction, with which Mr. Daibes fully complied. As before, we have consulted with the Government, which has graciously consented to the contents of the enclosed order. The Office of Pretrial Services has advised that it take no position on the international travel requested. If it meets with Your Honor's approval, we respectfully request that the Court execute it and direct its entry onto the docket.

Please do not hesitate to contact me if you have any questions or concerns, and thank you for Your Honor's kind attention to this matter.

GIBBONS P.C.

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Respectfully submitted,

s/Anne M. Collart

Anne M. Collart

Enclosure

cc: All counsel of record (*via ECF*)

Brian Nauer, U.S. Pretrial Services Officer (*via Email*)